

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America
v.

DAVID AARON BLOYED

Case No. 24-mj-2295

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 19, 2024 in the county of Davidson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

18 U.S.C. 875(c)

Offense Description

communicating a threat in interstate commerce

This criminal complaint is based on these facts:

Please see the attached statement in support of criminal complaint.

☒ Continued on the attached sheet.

/s/ Angelo DeFeo

Complainant's signature

FBI SA Angelo DeFeo

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone (specify reliable electronic means).

Date: September 20, 2024

City and state: Nashville, Tennessee



Judge's signature

Jeffery S. Frensley, United States Magistrate Judge

Printed name and title

STATEMENT IN SUPPORT OF A CRIMINAL COMPLAINT

1. Your affiant, Angelo DeFeo, is a Special Agent with the Federal Bureau of Investigation (“FBI”) and is assigned to the Memphis Field Office-Nashville Resident Agency. In my duties as a Special Agent, I investigate domestic terrorism violations, international terrorism violations, and other violent crimes. As a Special Agent, I am authorized by law and/or by the FBI to engage in or supervise the prevention, detention, investigation, and prosecution of violations of Federal criminal laws.

2. I make this statement in support of a criminal complaint charging David Aaron BLOYED with transmitting in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c). Specifically, I submit, as summarized below, that there is probable cause to believe that BLOYED transmitted a threat in interstate commerce on or about July 19, 2024, using the social media platform Gab to communicate over the internet that he intended to, along with others, lynch and kill Glenn Funk, the District Attorney for Nashville and Davidson County, Tennessee.

PROBABLE CAUSE

Background

3. I know, based on my training and experience and my knowledge of this investigation that the Goyim Defense League (GDL) is a small network of antisemitic provocateurs who espouse vitriolic antisemitism via the internet, through propaganda distributions and in street actions.

4. GDL organizes what it calls the “Name the Nose Tour” where its members travel to cities across the country to protest in the vicinity of synagogues and walk through the downtown

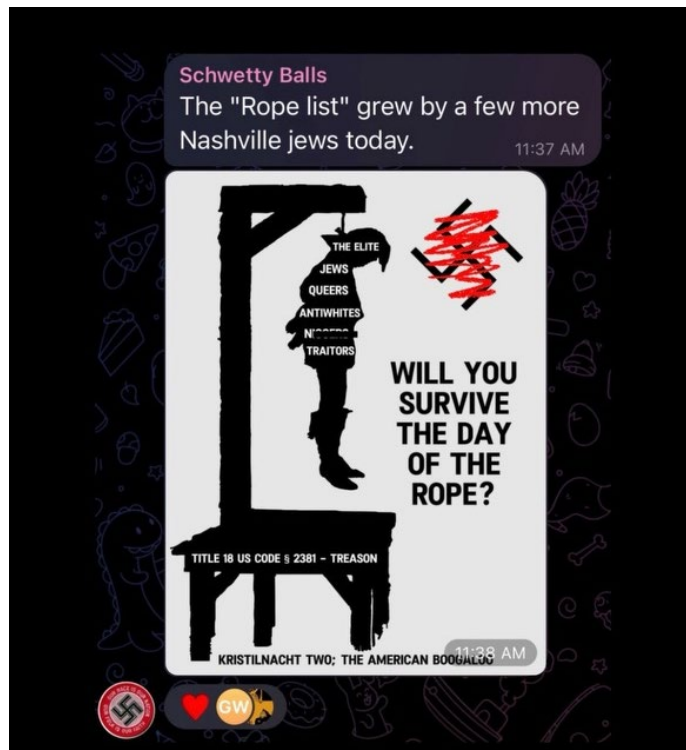
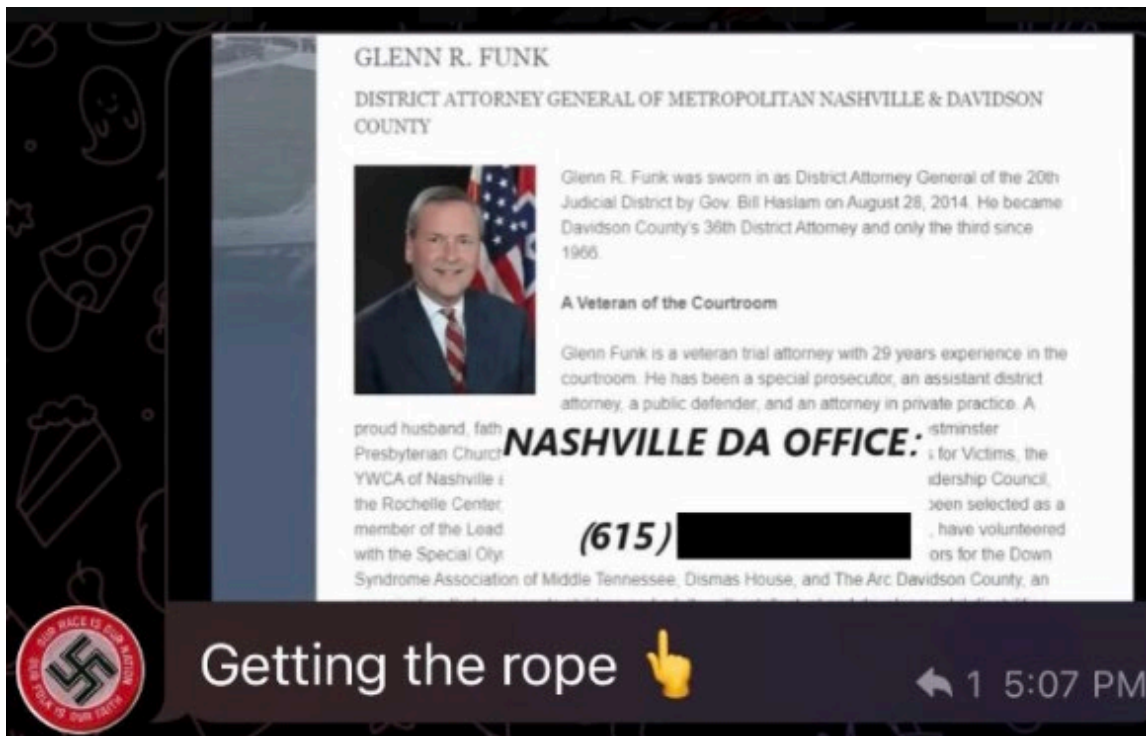
hubs of the cities they are in with Nazi flags and yell antisemitic slurs at any individuals they encounter.

Events in Nashville, Tennessee

5. In July 2024, members of GDL were present in the Nashville area as part of their “Name the Nose Tour 6.” On or about July 14, 2024, members of GDL were protesting downtown Nashville when certain participants in the protest they encountered an employee of one of the local establishments. A physical altercation occurred, and as a result, an individual known to be a GDL member, GDL member 1, was arrested and charged with Aggravated Assault due to his hitting the bar employee repeatedly with a metal flagpole that had a flag with a swastika affixed to the top of it.

6. While in Nashville, GDL members routinely posted about their “Name the Nose Tour 6” activities on various social media platforms, including Telegram.¹ Open-source research revealed that following the arrest of GDL member 1 on July 14, 2024, a Telegram user bearing username “Schwetty Balls” (hereinafter, the “Telegram Account”) posted the following threats against Nashville and Davidson County District Attorney (“DA”) Glenn Funk:

¹ Telegram is a cloud-based messaging service provider with headquarters in Dubai, United Arab Emirates. Telegram does not respond to U.S. legal process.

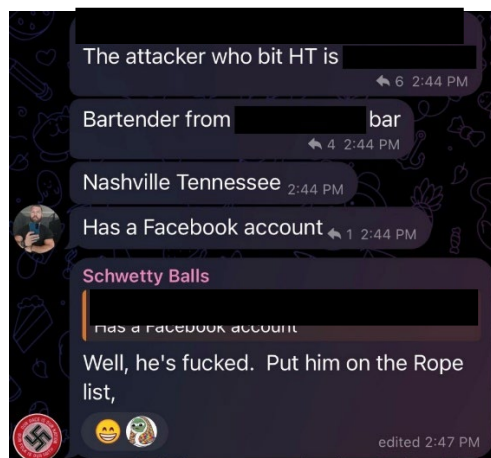


7. Based on my training and experience, I know that “The Day of the Rope” is a frequently cited white-supremacist concept that originates from *The Turner Diaries*. *The Turner*

Diaries is a novel written by William Luther Pierce, a white nationalist, that depicts the violent overthrow of the United States government and culminates in a race war that leads to the systemic extermination of non-whites and Jews. In the novel, the “Day of the Rope” describes the day when white supremacist rebels engage in mass lynchings of purported “race traitors” such as journalists, politicians, and women in relationships with non-white men.

8. As reflected above, the threats posted by the user of the Telegram Account included a photograph of DA Funk with the caption “Getting the rope” and an emoji finger pointed towards DA Funk’s image. The posts also included a photograph of a person hanging by the neck from a gallows, with the phrases, “The ‘Rope List’ grew by a few more Nashville jews today,” and “Will you survive the day of the rope?”

9. In addition to the posts directed at DA Funk, the user of the Telegram Account also threatened the victim of the alleged assault committed by GDL member 1 in Nashville on or about July 14, 2024:²



² “HT,” who is referenced in the Telegram post, is the purported leader of the GDL.

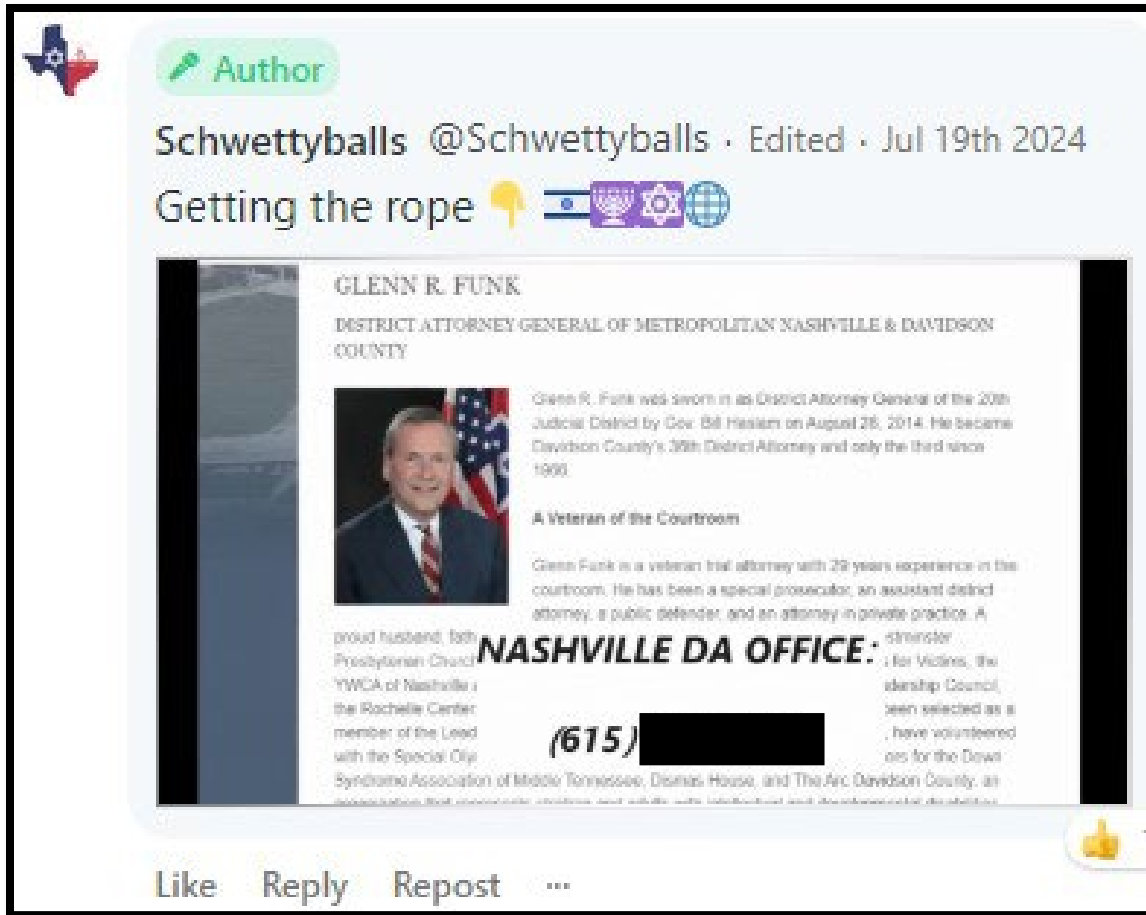
10. As depicted above, in response to a post that identified the victim of the alleged assault, the user of the Telegram Account stated that the victim was “fucked,” and directed that he also be put “on the Rope list.”

Identification of the Gab Account

11. Following the discovery of the threatening communications posted by the user of the Telegram Account, law enforcement conducted open-source research that revealed a Gab account with an almost identical username, “Schwettyballs” (hereinafter, the “Gab Account”).

12. I know, based on my training and experience and my participation in this and other investigations, that Gab, like Telegram, is a social networking platform that is known for its far-right userbase. Gab is widely described as a haven for Neo-Nazis, white supremacists, white nationalists, antisemites, and the alt-right. The use of Gab is common amongst individuals who have been banned from other popular social media networking sites like Facebook and Instagram for inappropriate posts flagged as racist, antisemitic, or encouraging of violent, criminal behavior.

13. A review of the Gab Account, later determined to belong to David Aaron BLOYED, revealed a Texas-themed profile photograph and threatening posts nearly identical to those posted on the Telegram Account. Notably, on or about July 19, 2024, BLOYED posted the following threat to DA Funk on the Gab Account:



14. This appears to be the same post that was made by the user of the Telegram Account on or about July 14, 2024.

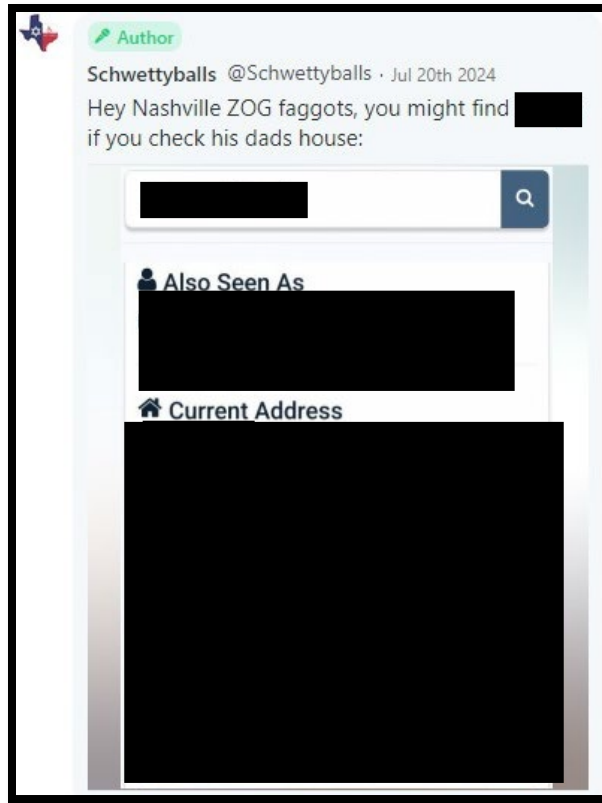
15. BLOYED closely followed the GDL's activities in Nashville with his Gab Account, including liking a post that stated, "FREE RYAN KRIEGER," which contained a link to a fundraising site seeking donations to aid GDL member 1 following his arrest. BLOYED also commented on GDL member 1's arrest in Nashville using the Gab Account:



16. BLOYED used the Gab Account to direct his associates to “harass the owner” of the bar in Nashville that employed the victim of the alleged assault by GDL member 1:



17. Additionally, in the post below, BLOYED revealed what he believed to be the home address of the victim of the alleged assault:



Identification of David Aaron BLOYED as the User of the Gab Account

18. On or about August 9, 2024, a subpoena was served on Gab for subscriber information associated with the Gab Account. The results of the subpoena revealed that the email used to register the account was dbloyed@airmail.net. A review of Accurint, a law enforcement database, identified dbloyed@airmail.net as an email account registered to David Aaron BLOYED.

19. The Gab subpoena return also identified the user of the Gab Account as a “Nat Soc,” which I understand, based on my training and experience, to mean that the user is a national socialist or Neo-Nazi. The subpoena return also showed that the user identified himself as “White Aryan not jewish” and listed his “enemies” as follows, consistent with the beliefs of the GDL: “My enemies are: jews, Royals, judeo church faggots, secret societies, all of them. Its the jews!”

20. On or about August 26, 2024, a subpoena was served on AMA TechTel for the subscriber information for the IP address used to create the Gab Account. The records from AMA TechTel showed that the IP address used to create the Gab Account originated from the following street address: 4210 FM 667, Frost, Texas 76641. A property records search revealed that 4210 FM 667, Frost, Texas 76641, is owned by David Aaron BLOYED.

21. The AMA TechTel records also listed (972) 567-6523 as the telephone number for the registered user of the IP address used to create the Gab Account. On or about August 26, 2024, a subpoena was served to AT&T for subscriber information related to telephone number (972) 567-6523. The results from AT&T revealed that this phone number is subscribed to David Aaron BLOYED. Additionally, the contact email address associated with this AT&T account is “dbloyed@airmail.net,” which is the same email address used to register the Gab Account.

22. On or about August 26, 2024, Special Agents from FBI Dallas conducted physical surveillance at the 4210 FM 667, Frost, Texas address linked to the IP address used to create the Gab Account and observed a Chevy Suburban in the driveway. The current registered owner of that vehicle is W.B. Law enforcement database searches revealed that W.B. is David Aaron BLOYED’s 85-year-old father, who law enforcement believes occupies a smaller structure on BLOYED’s property.

23. On or about September 3, 2024, a Special Agent from Nashville FBI spoke to a Lieutenant from the Waxahachie Police Department regarding a November 4, 2023 incident involving David Aaron BLOYED. During this incident, officers with the Waxahachie Police Department encountered BLOYED outside the Waxahachie Civic Center while BLOYED was passing out GDL flyers. According to the Lieutenant, BLOYED was asked to leave the area and subsequently called the Waxahachie Police Department to file a complaint against the Lieutenant.

24. Waxahachie Police Department dispatchers ran the phone number used to make the complaint, as is their policy when individuals leave messages, and identified BLOYED as the caller and the individual who was asked to stop passing out antisemitic flyers.

25. On or about November 4, 2023, the user of the Gab Account made the following post describing his encounter with the Waxahachie officers that day:

I just got ran out of the outside sidewalk entrance to the Waxahachie Texas convention center, I was outside the whole time, I never went inside, and still I got ran off by three ZOG bots telling me “you are detained, and if you do not leave you are under arrest for trespassing” and we will take your firearm and take you to jail. For handing out political/religious flyers on a city owned event center outside sidewalk at a gun show where everyone is armed. I got it all on my body cam and their body cams were on also. So I left and I drove straight to the Police station and dropped off a copy of the “Flyering case law” to the police chief and a few flyers and then I went to the town square/County court house and flyer every car in that Square for Waxahachie/Ellis county and for blocks around it. Fuck you Waxahachie and Ellis county! The 3 stooge Waxahachie City cops are listed below. We have two choices in how to deal with these clowns in the near future: Retraining or Rope. I would let two of them go for “retraining”, the other (Lieutenant XXXX³) goes 1/2 way on the Turner rope list and gets one more shot at being worth saving.

Time about 10:30 -11:00 PM 11/4/23

PD non emergency line: 469-309-XXXX

Officers were:

Sargent X. XXXX - Retraining.

XXXX XXXX, Lieutenant - Half way to the rope (you've got one more chance nigger)⁴

The younger officer, (I'm still getting his name) - retraining.

XXX XXXXX - Police Chief - not sure about him yet. I left him a voice mail, told him I am going back tomorrow and we can do it all again. Phone: (469) 309-XXXX

³ The use of “XXXX” is done to protect the identity of involved law enforcement officers. BLOYED publicly shared the names of all three law enforcement officers in his Gab post.

⁴ The lieutenant identified by BLOYED in his Gab post is African American.

26. The FBI obtained a copy of the voicemail message left by BLOYED with the Waxahachie Police Department on November 4, 2023, and it mirrors the events described in the November 4, 2023 post by the user of the Gab Account and discusses the same officers listed in the post. Based on this information, I believe that BLOYED is the user of the Gab Account.

CONCLUSION

27. Based on the foregoing, I submit that there is probable cause to believe that on or about July 19, 2024, David Aaron BLOYED, transmitted a threat to injure and/or kill Nashville District Attorney Glenn Funk over the internet using his Gab account, in violation of Title 18, United States Code, Section 875(c).